

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARILYN GAYE PIETY FOLEY : CIVIL ACTION NO.:
 : 2:22-cv-01777-WB
Plaintiff, :
 :
v. :
 :
DREXEL UNIVERSITY and :
 :
ROGER KURTZ, :
 :
Defendants. :

**DEFENDANT DREXEL UNIVERSITY’S MOTION FOR APPROVAL OF
SUPERSEDEAS BOND AND STAY OF JUDGMENT UNDER RULE 62(d)**

Defendant, Drexel University, by and through its counsel, Lamb McErlane PC and Tucker Law Group, moves this Honorable Court pursuant to Federal Rule of Civil Procedure 62(d) for approval of a supersedeas bond in the amount of \$425,992.10 issued by U.S. Specialty Insurance Company and for a stay of enforcement of and execution on the January 31, 2025 judgment in the above-captioned matter¹ pending the outcome of post-trial motions and appellate review. Pursuant to Local Rule 7.1, this Motion is based upon and hereby incorporates Drexel's contemporaneously submitted Memorandum of Law as though fully set forth at length.

Respectfully submitted,

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¹ The judgment was entered only against Drexel University. Prior to trial, summary judgment was granted in favor of Roger Kurtz. The instant motion is therefore filed on behalf of Drexel University only.

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Dated: March 7, 2025

Attorneys for Defendant, Drexel University